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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF ELOUISE JADHAV IN  
SUPPORT OF REORGANIZED DEBTORS'  
OBJECTION TO PROOF OF CLAIM NO.  
58562 FILED BY FULCRUM CREDIT  
PARTNERS LLC AS TRANSFEREE OF  
TUSCAN RIDGE ASSOCIATES, LLC**

**Response Deadline:  
October 26, 2021, 4:00 p.m. (Pacific Time)**

**Hearing Information If Timely Response Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 I, Elouise Jadhav, pursuant to section 1746 of title 28 of the United States Code, hereby declare  
2 under penalty of perjury that the following is true and correct to the best of my knowledge,  
3 information, and belief:

4 1. I am employed by Pacific Gas and Electric Company (“PG&E”) as a Senior Right of  
5 Way Agent. I interned with PG&E in the summer of 2018 and was hired as a contract Land Rights  
6 Agent in October 2018 to work in PG&E’s Emergency Management Advancement Program. In my  
7 job as a contract Land Rights Agent at PG&E, I supported the Accelerated Wildfire Risk Reduction  
8 (“AWRR”) Program by obtaining land rights for sites to support AWRR operations. In August 2019, I  
9 became a PG&E employee and held the position of Right of Way Agent. I was promoted to Senior  
10 Right of Way Agent in March 2021. My job duties since October 2018 have included negotiating  
11 agreements for the use of property, responding to issues of concern raised by property owners, drafting  
12 temporary use agreements (including license agreements) and obtaining PG&E approval for such  
13 agreements, and reviewing invoices and administering the payments related to license fees and other  
14 charges. I make this declaration based on my personal knowledge and review of PG&E records kept in  
15 the ordinary course of business and relied on by me, and my review of the documents attached to this  
16 declaration.

17 2. Attached as **Exhibit A** are true and correct copies of the Letter Agreement signed  
18 September 13 and 14, 2018, and the Amendment to Letter Agreement signed October 16, 2018, by and  
19 between Tuscan Ridge Associates, LLC and Pacific Gas and Electric Company for use of the license  
20 area at 3100 Skyway Road, Chico, as a support site in connection with PG&E’s Wildfire Risk  
21 Reduction efforts. By agreement, PG&E’s use of the License Area commenced September 9, 2018  
22 and ended December 10, 2018, or the date that PG&E demobilized and vacated the License Area.

23 3. On November 12, 2018, before the Letter Agreement signed September 13 and 14, 2018  
24 terminated, PG&E proposed terms to Tuscan Ridge Associates, LLC for entering into a new agreement  
25 for use of a license area at 3100 Skyway Road as a support site and base camp in connection with  
26 Camp Fire restoration work. Attached as **Exhibit B** is a true and correct copy of the Letter Agreement  
27 signed November 20, 2018, by and between Tuscan Ridge Associates, LLC and Pacific Gas and  
28 Electric Company for use of the license area at 3100 Skyway Road as a support site and base camp

1 commencing November 19, 2018 and expiring May 20, 2019. I am informed and believe that PG&E  
2 expanded its use of the property at 3100 Skyway Road with the consent of Tuscan Ridge Associates,  
3 LLC.

4 4. Attached as **Exhibit C** is a true and correct copy of the excel spreadsheet that I  
5 prepared to list the payments made by PG&E to Tuscan Ridge Associates, LLC for use of the property  
6 at 3100 Skyway Road. PG&E paid rent to Tuscan Ridge Associates, LLC for use of the property  
7 pursuant to the Letter Agreement signed September 13 and 14, 2018, from the commencement of that  
8 agreement through November 19, 2018. PG&E paid Tuscan Ridge Associates LLC for use of the  
9 property pursuant to the Letter Agreement signed November 20, 2018, from the commencement of that  
10 agreement on November 19, 2018 through May 20, 2019. In addition, PG&E paid the Independent  
11 Consideration to Tuscan Ridge Associates LLC as additional consideration on execution of the  
12 November 20, 2018 Letter Agreement and reimbursed Tuscan Ridge Associates LLC for the cost of all  
13 grading and winterization work at the property.

14 5. On March 19, 2019, Courtney McAlister, attorney for Tuscan Ridge Associates LLC,  
15 notified PG&E that Tuscan Ridge Associates, LLC expected to reach an agreement with ECC for use  
16 of the property at 3100 Skyway Road. Mr. McAlister informed PG&E that ECC would proceed to  
17 store portable base camp housing units on the property in March 2019 and asked PG&E to confirm that  
18 it did not object to ECC's use of the site pending a formal agreement. Mr. McAlister told PG&E that it  
19 should continue to maintain security on the property until Tuscan Ridge Associates LLC had a formal  
20 agreement with ECC.

21 6. On March 25, 2019, PG&E was informed by ECC that it had entered into a contract  
22 with Tuscan Ridge Associates, LLC for use of the property at 3100 Skyway Road.

23 7. On March 27, 2019, I contacted Mr. McAlister, the attorney for Tuscan Ridge  
24 Associates, LLC, about the work at the site by ECC, and I forwarded photographs of the ECC grading  
25 work at the site to him. I expressed PG&E's concern that ECC's substantial grading work exceeded  
26 the scope of permits for PG&E's base camp. True and correct copies of the photographs that I sent to  
27 Tuscan Ridge Associates, LLC are attached hereto as **Exhibit D**. Mr. McAlister informed me that  
28 ECC had a storm water pollution prevention plan in place for ECC's work at the premises.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing is true and correct. Executed this 20th day of September, 2021, in Castro Valley, California.

3  
4 /s/ Elouise Jadhav

5 Elouise Jadhav  
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